

REMARKS

Claims 1-20 are pending in the application. In the Office Action dated October 15, 2004, claims 1, 2, 7-12 and 16-20 are rejected, and claims 3-6 and 13-15 have been objected to.

In response, Applicant has amended claims 1, 16 and 19 to overcome the rejections, canceled claims 4 and 17, and amended claims 5, 6, 18 and 20 to correct dependency to prior claims.

CLAIM REJECTIONS – 35 U.S.C. § 102(b)

The Examiner has rejected claims 1, 2, 7–11, and 16-20 under 35 U.S.C. §102 as being unpatentable over Falcioni (U.S. Pat. No. 5,421,448), and claims 1, 2, 9 and 12 as being unpatentable over Straub (U.S. Pat. No. 6,135,267).

With regard to claim 1, as Applicant understands the rejection, the Examiner asserts that Falcioni teaches the claimed features. In claim 1, the features claimed include a debris-removal stage; a washing stage; a rinsing stage; and a drying stage; wherein said surface of said continuous loop conveyor belt passes through said stages to remove any debris and bacteria.

From a review of the Examiner's handwritten notes on Figure 1 of the Falcioni patent, it appears that the Examiner is asserting that the structured identified by reference Numeral 11 is a "scraper means for cleaning." However,

Applicant wishes to respectfully point out that the Falcioni patent lacks a reference in the specification to Numeral 11, and in fact, is devoid of any discussion whatsoever of Numeral 11. Also, there is no other Figure in the Falcioni patent which provides any further information or detail regarding the structured identified with Numeral 11. As a result, Applicant respectfully traverses the Examiner's rejection of claim 1.

The Examiner also rejected claim 1 based on Straub, and provided an annotated drawing in support of the rejection. Specifically, the Examiner referred to the structure in Figure 1 of Straub that was identified with Numeral 25 as a "debris-removal scraper edge." However, nowhere in the Straub reference is a "scraper edge" disclosed. In fact, a gap is clearly shown in Figure 1 between roller 17 and end section 25 of suction bell 9. Further, it is contemplated by Straub that debris enters bell 9 through that gap because "coarse dirt particles and contaminant materials that clings lightly to the transport belt, can be removed and discharged before the transport belt is sprayed with the cleaning agent." (See Straub, Column, 2, lines 55-60). Further, Straub actually contemplates a gap that is "constant, or generally or substantially or essentially constant, along edge 27 of end section 25. Specifically, it is edge 27 which both defines the bottom of end section 25, and also conforms in shape to and is spaced from the roll surface,

thereby forming the indicated distance or opening.” (See Straub, Column 5, lines 36-41).

In light of the disclosure of Falcioni and Straub, it is Applicant’s assertion that no scraping device is taught. Accordingly, Applicant has amended claim 1 to include a scraping device within the debris removal stage to further distinguish the claimed invention from both Falcioni and Straub. Support for this amendment is found in the Specification, page 15, line 3-6 and Figure 4 and 5. Applicant asserts that amended claim 1 is now in a condition for allowance.

Regarding claims 2, 7-11, and 12, Applicant asserts that these claims, which depend either directly or indirectly from now allowable claim 1, are likewise allowable.

Claim 16 has been amended to include one or more scraping devices, thereby avoiding the rejection under Falcioni. As outlined above, support for this amendment is found in the Specification, page 15, line 3-6 and Figure 4 and 5. Applicant asserts that this amendment places claim 16 in condition for allowance. Further, because claim 18 depends from now-allowable claim 16, it is likewise allowable.

Claim 19 has been amended to specify that the means for cleaning the conveyor further comprise a scraping device. Support for this amendment is found in the Specification, page 15, line 3-6 and Figure 4 and 5. Applicant asserts that


this amendment places claim 19 in condition for allowance. Because claim 20 depends from now allowable claim 19, it is likewise allowable.

SUMMARY

Applicant believes that by the instant Amendment to the claims, all rejections and objections raised by the Examiner have been overcome, and all claims currently pending in the Application are now in a proper condition for allowance. Should the Examiner wish to discuss this amendment in further detail, the Examiner is invited to telephone the undersigned

Respectfully submitted,

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